

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	
	)	<b>CRIMINAL NO. 12-262</b>
<b>JAMES HATZIMBES</b>	)	

**MOTION FOR EXTENSION OF  
TIME TO FILE PRETRIAL MOTIONS**

AND NOW, comes the Defendant, James Hatzimbess, by and through his attorney, Charles J. Porter, Esquire and the law firm of Brucker Schneider & Porter, and respectfully sets forth as follows:

1. The Defendant is charged with violation of Title 21, United States Code, Sections 841(a)(1), 3333(e) and 846 as well as Title 18, United States Code, Section 371 at the above number. He was arraigned on November 8, 2012.
2. Pretrial motions were due on December 23, 2012.
3. A ninety (90) day extension is requested to review discovery in this matter, based on counsel's schedule.
4. It is submitted that the ends of justice served by granting this extension outweigh the best interest of the public under the Defendant to a speedy trial for the period of the within extension.
5. The Government consents to this request.

WHEREFORE, the Defendant James Hatzimbess, respectfully requests this Honorable Court to enter an order extending the time period in which to file Pretrial Motions until March 23, 2013.

Respectfully submitted,

Date: January 18, 2013

/s/ Charles J. Porter, Esquire  
Charles J. Porter, Esquire  
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